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Symbol: EPC-DO: 18-484

LA-UR: N/A

Date: **DEC 19 2018**

Mr. John Kieling
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6313

**Subject: Supplemental Information for the Supplemental Environmental Project,
Settlement Agreement and Stipulated Final Order Request for Extension of Time**

Dear Mr. Kieling:

On November 30, 2018, in accordance with Section III, Part I of the Supplemental Environmental Project (SEP), Settlement Agreement and Stipulated Final Order HWB-14-20 (signed January 22, 2016), the U. S. Department of Energy (DOE) and Triad National Security, LLC (Triad) submitted to the New Mexico Environment Department (NMED) a request for an extension of time to complete the remaining required activities on SEP Addendums 1, 2, and 4. A follow-up meeting between DOE, Triad, and NMED to discuss this request was held on December 10, 2018. During this meeting NMED requested supplemental information to the initial extension request.

The requested supplemental information consisted of:

- Replacing the date range for completion of each SEP Addendum or SEP Addendum sub-project that was provided in the original extension request with a single date of completion. This single date would encompass all applicable subprojects.
- Identification of the number of days of requested extension beyond milestones identified in or associated with the approved work plans for each SEP Addendum.
- Additional detail on the nature of the extension time period.



The requested supplemental information follows:

Addendum 1 – Improvements to Transportation Routes Used for Transportation of Transuranic Waste to WIPP Work Plan

Summary of Work to be Completed:

- Award contract for the final design for the East Jemez / NM 4 road intersection.
- Completion of 100% final design for the East Jemez / NM 4 road intersection.

Extension Request Date: August 31, 2019

Number of Days Beyond Last Work Plan Milestone: 427

- The approved Addendum 1 Work Plan (see letter Michael T. Brandt and Kimberly Davis Lebak John E. Kieling ADESH: 17-041 dated May 26, 2017) required development and submittal of a final construction scope of work and schedule. However, the project has continued to work toward the tentative scheduled that was presented in the original Work Plan as the enforceable schedule. This schedule was posted to the Laboratory Electronic Public Reading Room.
- The construction schedule in the approved Addendum 1 Work Plan identified June 30, 2018 as the date of completion for the 100% design for the East Jemez / NM 4 road intersection.
- 427 is the number of days between June 30, 2018 and August 31, 2019.

Basis for Request:

- The final conceptual design report for the intersection design was completed in October 2018. It will take approximately eight months to complete the final design package.

Addendum 2 – Storm Water Engineering Structure Work Plan

Summary of Work to be Completed:

- Upper Cañon de Valle – final stabilization of some disturbed areas, surveying, as-built document preparation, and certification package preparation.
- Mid-Mortandad – placement of concrete; pipe welding, pull, and connection; pipe testing; punchlist items; site restoration; surveying; as-built documents; and certification package preparation.
- LID 1 Main Gate Pond – Phase II project activities including construction of detention basin and rock lined swales, site restoration; surveying, as-built document preparation, and certification package preparation. (Phase I completed in December 2017.)

All other work scope identified in the approved Addendum 2 Work Plan (LA-UR-16-29160) has been completed.

Extension Request Date: April 30, 2019

Number of Days Beyond Last Work Plan Milestone: 98

- The approved Addendum 2 Work Plan required development and submittal of a final construction scope and schedule. This schedule, posted to the Laboratory Electronic Public Reading Room (LA-UR-18-30919), identified January 22, 2019 as the date of completed construction for all Addendum 2 activities.
- 98 is the number of days between January 22, 2019 and April 30, 2019.

Basis for Request:

- Upper Cañon de Valle project start was significantly delayed due to fire restrictions in summer 2018.
- Delays in procurement of the construction subcontractor and construction delays due to early season winter weather conditions on the Mid-Mortandad Project. Work is in a canyon on a north facing slope.
- The site location for the LID 1 Main Gate Pond project is a shared location with the SEP Water Line Project. Due to unforeseen site conditions requiring realignment of the water line, start of the LID 1 Phase II is delayed until Water Line Project activities on the site are complete and site access is available.

Addendum 4 – Water Line Improvement and Metering Upgrade Work Plan

Summary of Work to be Completed:

- Final installation of Phase A & B water lines. Work to include bacteria testing, pressure testing, final tie-ins, and all site restoration work.
- Phase C & D - Metering equipment installation. Scope and schedule will be submitted to NMED for review and approval based on remaining available funds, prior to August 31, 2019.

Extension Request Date: August 31, 2019

Number of Days Beyond Last Work Plan Milestone: 274

- The approved Addendum 4 Work Plan (LA-UR-16-29042) required development and submittal of a final construction scope and schedule. This schedule, posted to the Laboratory Electronic Public Reading Room (LA-UR-17-31305), identified November 30, 2018 as the date of substantial construction completion Phase A and B waterline replacement and metering project.

Basis for Request:

- Delays in construction progress due to unknown subsurface rock formation necessitating a pipe realignment and redesign, other related construction technical and safety issues, and weather delays.
- Substantial completion of Phase A & B is required prior to awarding Phase C & D scope.

DOE and Triad personnel will continue to provide NMED managers and staff project updates at the monthly managers meeting and the quarterly SEP progress meetings. As has been previously done, these updates will also include information on current and final project costs.

Based on the revised schedules listed above, a signed and sworn Certification of Completion will be submitted to NMED for approval within 30 calendar days after the completion of each SEP.

Please contact Terrill Lemke at (505) 665-2397 or by email at tlemke@lanl.gov, or Peter Maggiore at 505-665-5025 or by email at pete.maggiore@nnsa.doe.gov if you have questions.

Very truly yours,



Enrique Torres
Division Leader

Very truly yours,



Peter Maggiore
Deputy Assistant Manager

ET/PM/TL:jdm

Attachment(s): None.

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